

EXHIBIT N

LUBIN & ENOCH, P.C.

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May 21, 2021

Via Email This Date to tjacobson@collin.edu to:

Collin College Board of Trustees
C/O Tonya Jacobson, Manager of HR/Employee Relations
Collin College
3452 Spur 399
McKinney, Texas 75069

**RE: TFA (Suzanne Jones adv. Collin College)
Appeal of Grievance Decision
Internal File No. 1858-079**

Dear Members of Collin College's Board of Trustees:

Pursuant to DGBA(LEGAL) and BDB(LEGAL), Dr. Suzanne Jones ("Dr. Jones") herein applies to the Collin College Board of Trustees for redress of her grievance. On February 10, 2021, Dr. Jones submitted her grievance and supporting documents, detailing how Respondents Dr. Neil Matkin, Dr. Toni Jenkins, and Collin College violated her legally protected rights under the United States Constitution's First Amendment, Texas Constitution, Article I, §§ 8 and 27, and her right to due process as set forth in *Service v. Dulles*, 354 U.S. 363 (1957) and its progeny. On March 5, 11, and 26, 2021, Dr. Jones supplemented her filing with additional documents for purposes of the Resolution Review Panel ("RRP")'s review of the matter.

On March 30, 2021, the RRP heard and recorded Dr. Jones' presentation of her grievance. On April 28, 2021, the RRP issued a decision erroneously denying the bases of her grievance. On May 5, 2021, Dr. Jones appealed the RRP's decision to Executive President Dr. Sherry Schumann, detailing the RRP's errors in reviewing her grievance. On May 18, 2021, Dr. Schumann denied her appeal. **Attach. A.** Dr. Jones incorporates by reference all the filings, correspondence, hearing and its recording, and subsequent decisions.

Pursuant to DGBA(LEGAL), page 1 (citing *Professional Association of College Educators v. El Paso County Community District*, 678 S.W.2d 94 (Tex. App. – El Paso 1984, writ ref'd n.r.e.)) and BDB(LEGAL), page 1 (citing *Professional Association of College Educators*, 678 S.W.2d 94), Collin College Board of Trustees, invested with the powers of government, is obligated to stop, look and listen to Dr. Jones' petition for redress of her grievance for the bases alleged therein. Dr. Jones respectfully requests that the Board additionally respond to her grievance and provide redress by way of granting her sought relief.

Collin College Board of Trustees
May 21, 2021
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Sincerely,

/s/ Nicholas J. Enoch

Nicholas J. Enoch, Esq.
Lubin & Enoch, P.C.

Enclosure

CC: Dr. Suzanne Jones (Via email only)
Amanda Moore, Esq. (Via email only to amandam@tsta.org)
Monica Velazquez, Esq. (Via email only to mvelazquez@collin.edu)
Richard Abernathy, Esq. (Via email only to rabernathy@abernathy-law.com)
Charles Crawford, Esq. (Via email only to ccrawford@abernathy-law.com)

ATTACHMENT A

COLLIN COLLEGE
LEVEL II - EXECUTIVE VICE PRESIDENT RESPONSE

Complainant:	<u>Suzanne Jones</u>
Respondent:	<u>Collin College, H. Neil Matkin, Toni Jenkins</u>
Date of Complaint:	<u>February 10, 2021</u>
Executive Vice President:	<u>Sherry Schumann</u>
HR Representative:	<u>Tonya Jacobson</u>
Date Issued:	<u>May 18, 2021</u>

After a review of the Complaint and supporting documentation provided by the Complainant, Respondent's response to the complaint, Collin College policy and procedures, and all other relevant data, the Executive Vice President hereby finds that the decision of the Hearing Officer/Resolution Review Panel is:

- ☒ Affirmed
☐ Affirmed in part and reversed in part (see explanation below)
☐ Reversed (see explanation below)

Executive Vice President Comments:

Executive Vice President Signature:

 5/18/21
Date